

STATE OF KANSAS



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PRMT SECTION

DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field  
Topeka, Kansas 66620-0001  
Phone (913) 296-1500

Mike Hayden, Governor

Stanley C. Grant, Ph.D., Secretary  
Gary K. Hulett, Ph.D., Under Secretary

February 25, 1988

Mr. David Trombold  
Hydrocarbon Recyclers, Inc.  
2525 North New York  
Wichita, Kansas 67219

Re: Facility Construction and Waste Analysis

Dear Mr. Trombold:

I am writing in response to the questions you asked at our February 4, 1988 meeting in HRI's offices. At that meeting, you asked if KDHE would require installation of a synthetic liner beneath the new concrete slab in the non-chlorinated solvent processing area. We will not require installation of the liner. The decision on whether to install it is entirely HRI's. We believe that the new sealed concrete flooring and leak detection system which you propose to install on the old concrete in the area would provide satisfactory protection.

Another question you asked was whether a specific gravity test could be used to determine if a BTU content test should be conducted on an incoming waste stream destined for use as kiln fuel. Since the BTU content of the waste is a critical parameter for kiln fuel, an indicator parameter such as specific gravity is not an adequate substitute test. You should continue to perform the BTU tests on the wastes which are to be used as kiln fuel.

Your final question was about the 8,000 BTU heat content restriction on waste which is to be used as kiln fuel. You wanted to know if lower BTU waste could be blended for kiln fuel so long as the blend met the requirements of the user of the fuel. We will allow the blending of waste with a heat content less than 8,000 BTU if the resulting blend meets the fuel specifications set by the user. HRI may begin blending waste less than 8,000 BTU content into the kiln fuel after its hazardous waste permit is issued. You should detail in the Part B permit application how the waste is to be selected for blending and the QA/QC procedures which will be used to assure that the blend meets the fuel user's permit requirements.



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RCRA Records Center

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If you have any questions, please feel free to call me at (913) 296-1613.

Sincerely yours,

*Martin West*

Martin L. West  
Environmental Engineer  
Hazardous Waste Section  
Bureau of Waste Management

sc.trombold.mlw

C Dale Stuckey

Wes Bartley ✓